# Resale Issues (cont.) (Delay and Its Effects)

Pacific Bell currently provides an excessive three week standard service delivery interval for business services and complex services because of the huge Pacific Bell order backlog. Even emergency expedite intervals are lengthy, awkward and have seriously negative consequences to both the CLC and end-users including loss of service and related lost revenues and additional expense.

Documentation: Tab 12 - experience gained at the expense of Globe Trotter Travel.

Non-Compliant with Checklist Item 14, 47 U.S.C. § 271(c)(2)(B)(xiv).

 Pacific Bell's poor OSS and LISC service cause CLC end-user customers to form a poor image of CLCs when reselling Pacific Bell loops.

Documentation: Tab 13 - Statements of William Harrelson, counsel for MCI, and William Ettinger, counsel for AT&T, in IECs' complaint case against Pacific Bell explaining why IECs are no longer promoting resold services. AT&T Notice of Ex Parte Communication with CPUC, CPUC Case Numbers 96-12-026, 96-12-044, 97-02-021. ICG employees report they are abandoning resale as a customer strategy.

that, largely, we agree that that is the way the matter is best presented; to have rebuttal presented separately. However, we have out-of-town witnesses and they're going to present both their direct and rebuttal at the same time, if that's all right with you.

ALJ WALKER: That's satisfactory.

That is all right with you,

Mr. Kolto-Wininger?

MR. KOLTO-WININGER: That's fine.

ALJ WALKER: Do the parties wish to make opening statements before we call our first witness?

Mr. Harrelson, did you plan an opening statement?

## STATEMENT OF MR. HARRELSON

MR. HARRELSON: Just very briefly. I appreciate that Commissioner Knight's in the room; the personal interest you're showing in the case.

We are presenting evidence today that, from MCI's perspective it's overwhelming evidence, that for the two years past since Pacific Bell first began to plan for the ordering process to support local services resale in California, very little progress has been made in terms of what it is CLECs and consumers need for resale provisioning to work in California.

And those failures don't just relate to complex systems that have to be worked out through industry standard rules. Those failures pertain to simple things like managing a staff, like having a

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realistic forecast, like cooperating in terms of sharing information that's essential to the preordering process and the ordering process; a system in place which systematically causes loss of dialtone, causes loss of 411 directory listings, and very recently as the testimony reflects, and I think a very real concern, loss of at least one 911 listing.

So I think I just want to emphasize the importance of this matter. It is fundamental to the legislatively-declared policy in this state that consumers should have choice and they should have choice in terms of quality services from multiple providers.

And so long as the state of affairs we presently find ourselves in sustains itself, continues, that legislatively-declared policy is being denied.

That's the California Legislature, not to mention U.S.

Congress who's basically also imposed on Pacific Bell an obligation to support local services resale.

And the complaint really goes fundamentally to the public's interest in competitive choice and fundamentally to protecting the consumers' interest in that legislatively-declared right.

It is so bad, your Honor, that frankly, the evidence will show that MCI and AT&T simply ceased selling their residential local service products.

We cannot any longer affect to suffer the harm to our business reputation which the current state of affairs has brought upon us. And we need this fixed as soon as

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MAY 21 '97 17:36

1	ALJ WALKER: The complaint alleges several
2	violations of FCC regulations.
3	Did you want the Commission to rule on whether
4	Pacific Bell has violated FCC regulations, and if so by
5	what authority would we do so?
6	MR. HARRELSON: Judge, could you give me a specific
7	reference, or can you I'm sorry; I don't have a
8	can I take a moment off the record and get the
9	complaint?
10	ALJ WALKER: Well, it's on Count 3 of your
11	complaint.
12	But let me ask you, Mr. Harrelson, rather than
13	continue this, could you or Ms. Lee go through your
14	complaint and tomorrow or the next day give me a
15	document telling me which counts are now moot and are no
16	longer being pursued by MCI?
17	MR. HARRELSON: Yes.
18	ALJ WALKER: Good. Thank you.
19	Mr. Ettinger, did you wish to make an opening
20	statement?
21	STATEMENT OF MR. ETTINGER
22	MR. ETTINGER: Thank you, your Honor. I'll try not
23	to repeat anything Mr. Harrelson said.
24	It's not my intention with the opening
25	statement to summarize our testimony. You have that,
26	I believe; certainly you've read that. What I want to
27	do is reemphasize the importance of this case.

What we're dealing with here is a situation

where the California Commission on its own, through its own rulings and through California statutes, mandated local competition and mandated effective interfaces between Pacific and the competitive local carriers and created legal obligations on the part of Pacific to facilitate that local exchange competition.

I don't think there's any question that that's the policy of this state, and it was the policy of this state even before the Telecommunications Act was passed to have local competition in this state because it was felt by the Commission after appropriate hearings and considering arguments that that -- such competition was truly in the best interest of the consumers of this state.

Having made that decision, having placed certain obligations on the part of Pacific Bell to have effective interfaces with the competitive carriers for the resale of local service so that we can at least have the beginnings of local competition, Pacific was obligated under California law, statute, and Commission rules to live up to that.

The complaint of AT&T as well as the other complaints and the interventions allege gross failures on the part of Pacific Bell, failures which in toto amount to a complete -- a virtually complete restriction of local exchange competition in this state.

Very few numbers of orders are dribbling through the process, and that's what this complaint is

about.

And unless this Commission orders Pacific Bell to take certain affirmative steps to release that bottleneck, to release that constriction, we will not have local exchange competition in this state and the losers will be the consumers of this state.

And I would only -- to contrast, if we don't think there truly is a constriction in this case, what Pacific can do on the one hand for inter- and intraLATA PIC changes on behalf of its soon-to-be operational affiliate PBCOM on the other hand what it can do for its competitive CLCs.

I think it's clear, and I don't think Pacific even contests the fact that it's going to be able to handle something like 80 to 120,000 PIC change orders per day when PBCOM gets into operation.

efforts in convincing customers because of the price or the quality of its service to shift away from AT&T, MCI and Sprint or any other carriers and go to PBCOM for interLATA service, PBCOM is not going to have any more than the normal two- to three-day period to get those customers switched over so that competition in the interLATA market will -- which is already vibrant -- will continue, and as PBCOM suggests, perhaps become more competitive.

But in the local exchange market, we have the situation where competition is just being totally shut

come to a close?

down so that only several hundred orders a day can be
put through the process. And even as to those orders,
there's grave concerns about whether those orders are
being put through correctly in the sense of customers
being disconnected, customers losing features they
requested, customers not being properly listed in the
411 database and even I think I read in an MCI
rebuttal testimony a customer not correctly listed in
the E-911 database.
So what we have is a total almost complete
restriction of local exchange competition, which is
contrary to the obligations that Pacific had under
California law and Commission rules.
Thank you.
ALJ WALKER: Mr. Ettinger
MR. ETTINGER: Yes, sir.
ALJ WALKER: do the workshops going on address
some of the technical problems that confront the parties
here?
MR. ETTINGER: There are workshops dealing with
long-term solutions, yes, your Honor.
ALJ WALKER: Are those ongoing now, or have they

MR. ETTINGER: I've just been told by Mr. Chang who was working at those workshops that those have just completed.

ALJ WALKER: Have they solved all of our problems, Mr. Chang?

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MR. CHANG: No, your Honor, they have not.

There are many Hhings that are -- areas that are still open, part of which are dependent on industry standards being established from the Ordering and Billing Forum, the OBF.

ALJ WALKER: Thank you.

LAW OFFICES N. SELBY

Sprint, Ms. Van Dieen, did you wish to make an opening statement?

#### STATEMENT OF MS. VAN DIEEN

MS. VAN DIEEN: Thank you, your Honor, just briefly.

I'd like to -- Sprint supports the comments made by MCI and AT&T and would like to reiterate those, and emphasize for the Commission the importance of these complaints to the development of local competition in California.

As counsel for MCI indicated, MCI and AT&T have had to curtail their efforts, and Sprint has also had to curtail marketing efforts instead of moving forward in its effort to actually cut back the numbers of orders simply because existing levels aren't getting through.

And it's just critical that the Commission address the root cause of these problems so that competition can develop.

Thank you.

ALJ WALKER: Thank you, Ms. Van Dieen.

Before I get to Pac Bell, are there opening

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# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

C. 96-12-026
C. 96-12-044
·
C. 97-82-021

#### NOTICE OF EXPARTE COMMUNICATION

Pursuant to Rule 1.4 (a) of the Commission's Rules of Practice and Procedure, AT&T Communications of California, Inc. (U 5002 C) ("AT&T") hereby gives notice of the following ex parte communication:

The communication was initiated by AT&T, and took place during a meeting with

Jose Jimenez, Commissioner Conlon's Advisor at 11:30 a.m. on May 13, 1997, at 505 Van Ness

Avenue, San Francisco, California. Other participants included Rick Witherington, AT&T

Government Affairs Vice President; and Randolph Deutsch, AT&T General Attorney.

During the meeting, Mr. Witherington expressed concern over Pacific Bell's plans to implement its "flow through" upgrade to the RMI/NDM on May 31, 1997. He explained that,

as recently as March 18, 1997, Pacific had assured AT&T that the upgrade would not affect existing NDM spanifications for the CLCs. However, on April 23, Pacific proposed new RMI/NDM specifications that would require AT&T to make significant changes to its systems. AT&T was informed by Pacific that finalized specifications could be expected by May 15.

Mr. Witherington stated that the May 31 implementation as planned by Pacific Bell was inappropriate, noting that additional time would be required for AT&T to analyze the specifications and then implementative necessary coding changes to its systems. He warned that implementation of the modified upgrade on May 31 would scriously compromise AT&T's ability to process new local service customer orders, and that AT&T had requested that Pacific implement the flow through on May 31 in a manner that would be transparent to AT&T as previously committed. Written documentation regarding the upgrade was provided to Mr. Jimenez. [See attachments, confidential information excluded]

To obtain a copy of this notice, please contact:

Doretta Dea
AT&T Communications
795 Foisom Street, Room 285
San Francisco, CA 94107
(415)-442-2985
(415)-442-2357 (FAX)

Respectfully submitted,

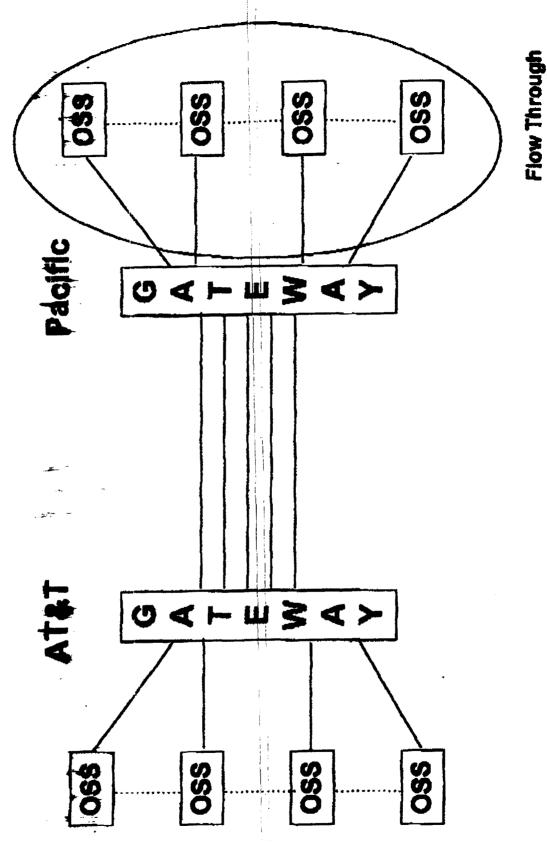
Richard B. Sparacino

Supervisor

AT&T Communications of California, Inc.

May 15, 1997

Electronic Interfaces



# **Timeline**

- 3/18 Pacific informed AT&T that "there are no changes to the existing interim electronic interface (NDM) specifications from a CLC perspective" that would result from the 5/31 OSS "flow through "release (Stankey letter to Collier)
- 4/23 Pacific Bell provides AT&T a 126 page set of specifications for the NDM/RMI interface "flow through" release on 5/31 that includes numerous changes that require changes by CLCs to their systems (Basic Exchange RMI Preparation Guide)
- AT&T informs Pacific that the unileteral changes Pacific has proposed will significantly impact the orders that are moving over the interface, that they are unacceptable, and that Pacific must make the "flow through" implementation transparent to AT&T, as repeatedly promised orally and in writing. Any changes must be jointly agreed, Per Attachment 11, Appendix C of our Agreement. (Hedg-Peth letter to Bauman)
- AT&T reiterates to Pacific that the proposed changes Pacific proposes to implement on 5/31 will render the interface inoperable without major changes by AT&T; that AT&T was not given sufficient time to modify its systems, especially given that the proposed changes will not be finalized until 5/15. AT&T asks Pacific to make all changes to implement "flow through" transperent consistent with prior commitments. AT&T informs Pacific it will need 3 weeks after specs finalized to determine the time needed to change its systems. (Collier letter to Corby)

# A Devastating Impact on Local Competition

- AT&T has already been forced to halt all consumer marketing for local service due to Pacific's severe capacity contraints
- AT&T's ability to process orders over the interface will be virtually nonexistent for several months if "flow through" upgrade implemented as proposed by Pacific
  - All business customer orders will reject
  - All new service and move orders will reject
  - All disconnect orders, migration w/ disconnect will reject
  - All orders w/ nontraditional addresses (e.g., no # or name)
     will reject
  - All handicap, remote access to call forwarding, and toll blocking feature orders will reject

# Proposed CPUC Action

- Issue Assigned Commissioner's Ruling requiring Pacific to implement "flow through" only upgrade on 5/31 in a manner that is transparent to CLCs as previously agreed.
- If Pacific is not able to meet the 5/31
  deadline, require Pacific to maintain current
  system until it can reach agreement on final
  specifications and provides necessary lead
  time for all parties to implement and test the
  changes

# Resale Service Issues (cont.)

• Pacific Bell has frequent resale service policy and points of contact changes which are confusing and misleading, cause service provisioning and installation delays, and are sometimes unfair and unnecessary.

Documentation: Tab 7 - Copy of electronic mail from Justin Chris-Tensen, ICG, Director, Resale Local Service Center, Sacramento, California.

Documentation: Tab 8 - Copy of electronic mail from Maryanne Chagnon, ICG, Manager, Resale Local Service Center, Sacramento, California.

From: KramerA [KramerA@dsmo.com]
ent: Monday, January 26, 1998 7:10 PM

fo: Holdridge, Bruce

Subject: FW: Pacific Bell Practices



Forward.txt

> section 4.1.1 Item 27 so they say.

Pacific Bell is more frequently (sometimes daily, see below) changing the rules under which companies interface and conduct general daily business. Bruce

-Original Message----Chris-Tensen, Justin/SLS-SAC > From: > Sent: Monday, December 15, 1997 10:12 AM Holdridge, Bruce, Odenthal, Laura/SLS-SAC > To: Chagnon, Maryanne/LSC Manager; Hollak, Joe/LSC-SAC > Cc: RE: Pacific Bell Practices > Subject: > This concerns me greatly. Please keep me in the loop... also, let me > know if you need for me to intervene with PB since I still have a few > contacts over there. > Jc-t > From: Odenthal, Laura/SLS-SAC > Sent: Friday, December 12, 1997 6:55 AM > To: Holdridge, Bruce Cc: Chagnon, Maryanne/LSC Manager; Hollak, Joe/LSC-SAC; Chris-Tensen, Justin/SLS-SAC > Subject: FW: Pacific Bell Practices > Bruce. > As of Monday we have no more contact at PB as Tony J. has moved > on....Now we are rapidly finding that the rules seem to be changing > rapidly. > This is an FYI. > Laura > From: Hollak, Joe/LSC-SAC > Sent: Thursday, December 11, 1997 2:04 PM > To: Odenthal, Laura/SLS-SAC > Subject: Pacific Bell Practices > Hi Laura > Well yesterday Pacific Bell changed the way that we can order CSR's > ...for some time we just FAX over a request and listed the BTN and > that was that. Now we have to copy the LOA and the company name and > then list the BTN's, I found this out by getting a reject, no warning > or anything on some BTN's that I had ordered. > Well, today is another day, so we have another change...sent an order in yesterday and today it was rejected, so I called the LISC to find > out what the BAN is/was. They (PT&T) checked around and a manager > said yes it is now required, the BAN for the North is 273-596-0043 and > the BAN for the South is 373-596-0043. This can be found in the LIO

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>	It would be nice if they would give us a heads up as it would save
	both their company and ours some unnecessary time and effort. Alas
>	guess it is learn the changes as we go.
`	
	Just a heads up for you and letting you know what is going onPT&T
>	is making changes.
>	
>	
>	
	Thanks
>	Joe Hollak916-362-9849

# Resale Service Issues (cont.)

 Pacific Bell has frequent resale service policy and points of contact changes which are confusing and misleading, cause service provisioning and installation delays, and are sometimes unfair and unnecessary.

Documentation: Tab 7 - Copy of electronic mail from Justin Chris-Tensen, ICG, Director, Resale Local Service Center, Sacramento, California.

Documentation: Tab 8 - Copy of electronic mail from Maryanne Chagnon, ICG, Manager, Resale Local Service Center, Sacramento, California.

From:

Chagnon, Maryanne/LSC Manager

ent:

Tuesday, December 23, 1997 2:09 PM

To:

Holdridge, Bruce

Subject:

PACIFIC BELL Anti-Competitive

Bruce,

PacBell is now insisting we have an LOA with our CSR requests. This issue was at legal for MCI last year and they stopped requesting the LOA.

Can we check into this again?

Thanks.

Maryanne

From:

Chagnon, Maryanne/LSC Manager Tuesday, December 23, 1997 2:35 PM

ent:

To: Cc: Holdridge, Bruce

Subject:

Odenthal, Laura/SLS-SAC RE: PACIFIC BELL Anti-Competitive

Bruce,

We don't have an issue with it except, while at MCI if we did not put the right customer name on the LOA we would get a reject. This started a major deal and finally PacBell ok'd that they would issue csr's with just the BTN.

For example if we have an LOA with the name: Lydia's Nails and Hair and this customer has her BTN under " Lydia's Beauty Supply' PacBell would reject the order even though the BTN is correct.

This went to Legal at MCI and PacBell stopped requesting LOA'S.

We are supplying the LOA at this time, but I thought this was a moot issue.

If you have any questions I know Laura Odenthal is aware of this, but please call me at 916 361 0553.

#### Maryanne

From: Holdridge, Bruce

Sent: Tuesday, December 23, 1997 12:25 PM To: Chagnon, Maryanne/LSC Manager Subject: RE: PACIFIC BELL Anti-Competitive

Maryanne, I'm not sure I understand the issue. If ICG has a LOA to switch the customer from Pacific Bell to ICG, why should ICG be hesitant to disclose the document? Am I not getting something here? Give me more background information. Thanks, Bruce

----Original Message---From: Chagnon, Maryanne/LSC Manager
Sent: Tuesday, December 23, 1997 2:09 PM
Holdridge, Bruce
Subject: PACIFIC BELL Anti-Competitive

Bruce.

PacBell is now insisting we have an LOA with our CSR requests. This issue was at legal for MCI last year and they stopped requesting the LOA.

Can we check into this again?

Thanks.

Maryanne

# **Number Portability Issues**

 Pacific Bell, with extreme frequency, incorrectly implements Directed Number Call Forward (DNCF) when converting resale business line customers from Pacific Bell service to ICG service. Pacific Bell consistently disconnects the customers old telephone number long before implementing the new ICG telephone number thus leaving the customer without telephone service; or, Pacific Bell implements the wrong new phone number on number change announcements.

Documentation: Tab 9 - Copy of electronic mail from Darlene Dudics, ICG, Customer Service Manager, Irvine, California.

Customers: Chen International
Travers Realty
International Marine
Legal Reprographics

Documentation: Tab 10 - Copy of electronic mail from Jim Haynes and Ann Cowan, ICG, Southern California.

Customers: Burnham Institute
Audio, Video & Computers
Legal Reprographics

 Pacific Bell has a policy and is unwilling to provide number retention when changing customers from Centrex service to business line local exchange service. There is no technical reason for this policy.

Documentation: Tab 11 - Customer letter from State of California, Franchise Tax Board.

From:

Dudics, Darlene

ent:

Monday, January 19, 1998 10:26 AM

To:

Holdridge, Bruce; Oolman, Brad

Subject:

**OUT OF SERVICE CUSTOMERS** 

Hello Bruce! It's been awhile since we've talked, but I thought it was time to get you involved.

We have had over the last 4 weeks, customers taken down by Pacific Bell in error with reference to our DNCF orders. The following are the scenarios:

1. Chen International DNCF placed with Due Date of 1-29-98

PON#128932,

DNCF canceled on 1-14-98, with verbal confirm.

128932-1 through 10

DNCF worked by PB 1-29-98

Restore time 5 hrs. Cust. May Cancel with ICG

2. **Travers Realty** PON# 71020

DNCF placed with Due Date of 1-9-98

DNCF canceled on 12-31-97

DNCF worked by PB 1-9-98

Restore time 4 hrs. Cust. May Cancel with ICG

3. International Marine DNCF placed with Due Date of 11-18-97 PM

PON#79974

**DNCF** worked 11-14-97

Restore time 3 hrs.

DNCF worked again 11-18 in AM not PM Restore time 8 hrs. CUSTOMER CANCELED

Legal Reprographics

DNCF placed with Due Date of 12-5-97

PON# 28693

DNCF worked 12-4-97 Restore time - unknown

**CUSTOMER CANCELED** 

This is becoming what feels like routine on our DNCF orders. What I have given you are orders worked by my team for mostly the LA area. I understand there are many more in the Irvine division. I have may more to list from LA and can get to you the list of Irvine orders, but will wait for your request if needed.

Thought this might wet your appetite. Have fun and hope to speak with you soon. Dar

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Customers: Chen International Travers Realty

International Marine Legal Reprographics

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Audio, Video & Computers

Legal Reprographics

 Pacific Bell has a policy and is unwilling to provide number retention when changing customers from Centrex service to business line local exchange service. There is no technical reason for this policy.

Documentation: Tab 11 - Customer letter from State of California, Franchise Tax Board.

From: ent: KramerA [KramerA@dsmo.com]
Monday, January 26, 1998 7:10 PM

To:

Holdridge, Bruce

Subject:

FW: Pac Bell Bad Practices



> Ann Cowan

More proof of Pacific Bell DNCF problems. Bruce

--Original Message-Haynes, James/SLS-IRV > From: Monday, December 08, 1997 9:30 AM > Sent: > To: Holdridge, Bruce Robinson, Mike/VP/GM NoCalif; Buntz, Jim/VP&GM-San Diego > Cc: FW: Pac Bell Bad Practices > Subject: > Bruce This is an issue that should be taken to the PUC. I don't > believe this is an accident. On 11/17/97 the same thing happened at > Burnham Institute (early DNCF putting the customer out of service). > The customer told us to cancel our order for ICG service. Fortunately >, We were able to talk Burnham Institute into staying with us. I > offered Legal Reprographics a \$500 dollar credit for his inconvenience > to stay with us and he declined. Jim > Haynes From: Cowan, Ann/RASC-San Diego > Sent: Friday, December 05, 1997 12:56 PM > To: Haynes, James/SLS-IRV Cc: Nezat, Shelli/SLS-San Diego; Cummins, Barbara/IRV-CSC; Rhoads,
 Zena/ SD-RASC; Alberson, Rick/SLS-San Diego; Barragan, > Gerardo/DialTone-SD; Talamantes, Diann\l?R Coord. > Subject: Pac Bell Bad Practices > Jim, > Thank you for your offer to forward an instance of an early DNCF on to > Bruce Holdridge to build a case to present to the PUC. > We were given a firm order commit date of 12/5/97 at 5 PM from Pacific > Bell to perform a call forwarding of current LEC numbers to new ICG > numbers for our customer Legal Reprographics (Contract #110668). The > DNCF was worked on 12/4/97 and when the customer attempted to begin > business this morning anyone attempting to dial his premises would > receive a message indicating that the number had been disconnected. > We then worked with Pacific Bell to reverse the call forwardings as > quickly as possible. > Diane Talamantes in our Repair bureau who first contacted me at 8:15 > to report the condition stated that this has happened multiple times > in the recent past and has come to be considered by her group as > competitor sabotage. Perhaps we can combine our experiences with > Legal Reprographics and Burnham Institute with other cases the Call > Center/Repair Depot in Irvine has experienced before sending them all > up to Bruce's attention. Regards,

From:

KramerA [KramerA@dsmo.com]

ent:

Monday, January 26, 1998 7:10 PM

fo:

Holdridge, Bruce

Subject:

FW: Pac Bell Bad Practices



Forward.txt

Al, Another example of Pacific Bell misconduct. Bruce

---Original Message----

> From: Haynes, James/SLS-IRV

Thursday, December 11, 1997 4:26 PM > Sent:

> To: Holdridge, Bruce

Buntz, Jim/VP&GM-San Diego; Robinson, Mike/VP/GM NoCalif

Pac Bell Bad Practices > Subject:

> Bruce

> I have another example of a PB DNCF cut a day early. This > happened to Audio Video & Computers about 3 months ago. Once again > they cut the customer a day early. We had to scramble but we cut the > customer early and they were only out of service 4 hours. Pac Bell > sents us a confirmation letter of DNCF dates so they cannot claim that they had the wrong date. The recording says this number has been
 disconnected so they are only working half of the order. They did not
 forward the call to ICG. Before they work a disconnect they should be required to wait for us to call them and confirm that the cut is a go.
 We would have a number to call. This can be done, because that is
 the way they do it at BC Tel (RBOC) in Canada.